

REMARKS/ARGUMENTS

The present communication is filed in response to the Official Action mailed February 9, 2007, finally rejecting all the claims presently pending in the application ("Final Rejection".) Of the pending claims, claims 1 and 11 are independent claims. All the other claims remaining in the application, namely claims 3-10 and 13-20 depend from one of the independent claims. Although a complete listing of the claims is included above, no amendments were made to the claims. Applicant respectfully submits that the claims are proper form for appeal.

As an initial matter, applicants note with appreciation the telephone interview that took place on April 24, 2007, between the Examiner, Orville Cockings, and the undersigned. The interview concerned the Final Rejection, including discussions concerning the rejections under 35 U.S.C. §112 and the art cited. Per the Examiner's request, applicants provide the remarks below as discussed during the interview.

Amendments to Drawings

Fig. 8A has been amended to correct the terminology used in step S5. Specifically, "Node Unique ID" has been changed to --Unique ID Numbers of the Nodes--. This amendment is clearly supported by the Specification, which (as already discussed in Amendment filed November 6, 2006) consistently refers to a unique node ID in connection with the relevant method. See, e.g., *Specification*, p. 17, ll. 12-19.

Claim Rejections — 35 U.S.C. §112

Claims 1 and 11 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. However, during a telephone interview on April 24,

2007, the Examiner indicated that this rejection would be withdrawn if the language found in step S5 of Fig. 8A was corrected. Because Fig. 8A has been amended to include the appropriate terminology, Applicants respectfully request that the rejections under §112, first paragraph be withdrawn.

Although the Examiner wanted to further consider and discuss the amendments to the drawings with his supervisor, he agreed that if accepted it would overcome the §112 rejection. In that regard, applicants note that the amendments to the drawings are fully supported by the specification.

As discussed in the Amendment filed November 6, 2006, the specification makes it clear the "Node Unique ID" is a typo in Fig. 8A. In Fig. 8A at step S5, the term "NODE UNIQUE ID" is used. In describing Fig. 8A, the specification states, however, that "If the number of equipment connected to the bus is equal to or less than 5 in step S3, the unique ID numbers of the nodes of the equipment connected to the bus are discriminated (Step S5.)" (Original Specification, p.17, 11.12 - 15 (Emphasis Added).) Thus, according to this portion of the written description, it's the Unique Node IDs that are discriminated. This description is consistent with the remainder of the specification.

Claim Rejections - 35 U.S.C. §103

Claims 1, 3-8, 10-11, 13-18, and 20 were rejected under 35 U.S.C. §103(a) as being unpatentable over EP Patent No. 0853402 to Yoshino et al. ("Yoshino") in view of U.S. Patent No. 5,764,930 to Staats ("Staats"). Claims 9 and 19 were rejected under §103(a) as being unpatentable over *Yoshino* in view of *Staats* and in further view of U.S. Patent No. 6,507,953 to Horlander.

During the interview, the Examiner agreed that *Staats*' data records included base addresses that were pointed to (or referenced) using node reference IDs. Although the node reference IDs were fixed, if the base address changed, the record changed. The Examiner, however, requested that applicants include their arguments in this amendment. Those arguments are set out below.

In issuing the rejections over prior art, the Examiner equates the "unique node ID" of the independent claims of the present application to the "node base addresses" disclosed by *Staats*. However, as discussed during the interview, even if it is accepted that the two are the same, the system of *Staats* operates differently than the apparatus and method to which the claims are directed. In particular, *Staats*' node base addresses are not one in the same or suggestive of the operation of unique node IDs in the independent claims.

Staats describes a node base address as the logical address of a node within the bus address space. See *Staats*, Col. 4, ll. 15-17. *Staats* goes on to state that "[n]ode base addresses are subject to change across both bus resets and system resets." *Staats*, Col. 4, ll. 19-21. *Staats* provides for "reset transparency from the point of view of a driver which initiates a bus transaction." (*Id.*, col.5, ll.4-6.) *Staats* achieves his results by, as noted by the Examiner, creating data records that associate a node base address with a corresponding node unique ID. (*Id.*, ll.6-8.) These records are stored in memory and are accessed each time a bus transaction is initiated. (*Id.*, ll.8-10.)

Node reference IDs serve as pointers to the data records. Upon a bus reset, base addresses change, but the node reference IDs do not change. Thus, after a bus reset the node reference IDs are used to point to the previously created records based on the node unique ID in the record. "If a bus

reset occurs while the bus transaction is pending, the device data records are updated to reflect a new node base addresses." (*Id.*, 11.28-30.) Significantly, since *Staats*' record contains base addresses, that record changes after each bus reset and after a device is disconnected or reconnected.

That operation, however, is distinguishable from the claimed invention. In particular, since *Staats* clearly teaches that the base addresses change after a bus reset occurs, *Staats* previously created record is not maintained "regardless of whether said selected device remain connected to said digital interface," as is recited in the claims. Specifically, after a bus reset, *Staats* requires that the previously stored record be changed to reflect new base addresses. But that is not what applicants have claimed.

In contrast to *Staats*, claim 1 recites:

a register for selecting a predetermined number of devices from among a plurality of digital signal processing devices connected to said digital interface and for allocating unique node identification numbers to said selected devices, for each of said selected devices, said register storing a record of said unique node identification number allocated to said selected device and maintaining said record regardless of whether said selected device remains connected to said digital interface.

(Emphasis added.) Thus, while the node base addresses of *Staats* change when a device is disconnected and reconnected, the unique node IDs of the present application are maintained in the stored record.

Accordingly, *Staats* fails to teach or suggest "said register storing a record of said unique node identification number allocated to said selected device and maintaining said record regardless of whether said selected device remains

connected to said digital interface" as recited in claim 1.

Moreover, Yoshino also fails to meet this limitation. Because neither *Staats* or *Yoshino* accounts for maintaining a record the unique node ID when a device is disconnected, Applicants respectfully submits that claim 1 is patentable over these references. Furthermore, because claims 3-10 depend from and therefore include all the limitations of claim, Applicants submit that claims 3-10 are patentable for at least the same reasons. Accordingly, it is respectfully requested that the rejections of claims 1 and 3-10 be withdrawn.

Claim 11 recites similar limitations to claim 1. Specifically, claim 11 recites:

said registering step including allocating a unique node identification number to each of said selected devices and, for each of said selected devices, storing a record of said unique node identification number for said selected device regardless of whether said selected device remains connected to the digital interface.

Therefore, it is respectfully submitted that claim 11 is patentable for at least the reasons discussed above in connection with claim 1. Because claims 13-20 depend from claim 11, and therefore include all the limitation thereof, Applicants submits that these claims are patentable for at least the same reasons. Thus, Applicants request that the rejection of claims 11 and 13-20 be withdrawn.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that he

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telephone applicants' attorney at (908) 654-5000 in order to overcome any additional objections which he might have.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

Dated: May 9, 2007

Respectfully submitted,

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IN THE DRAWINGS

Please amend Fig. 8A as shown in the REPLACEMENT SHEET.

Specifically, change "NODE UNIQUE ID" to --UNIQUE ID NUMBERS OF THE NODES--.